

1 MICHAEL B. BROWN, Bar No. 179222
michael.brown@stoel.com
2 THOMAS A. WOODS, Bar No. 210050
thomas.woods@stoel.com
3 BENJAMIN J. CODOG, Bar No. 307034
ben.codog@stoel.com
4 MICHELLE J. ROSALES, Bar No. 343519
michelle.rosales@stoel.com
5 STOEL RIVES LLP
500 Capitol Mall, Suite 1600
6 Sacramento, CA 95814
Telephone: 916.447.0700
7 Facsimile: 916.447.4781

8 *Attorneys for Plaintiff METROPOLITAN LIFE*
9 *INSURANCE COMPANY*

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO DIVISION
13

14 METROPOLITAN LIFE INSURANCE
15 COMPANY, a New York corporation,

16 Plaintiff,

17 v.

18 ACDF, LLC, a California limited liability
company, as successor by merger to 104
19 PARTNERS, LLC; WILLOW AVENUE
INVESTMENTS, LLC, a California limited
liability company; ASHLAN & HAYES
20 INVESTMENTS, LLC, a California limited
liability company; GRANTOR FRESNO
21 CLOVIS INVESTMENTS, LLC, a California
limited liability company; MARICOPA
22 ORCHARDS, LLC, a California limited
liability company; FARID ASSEMI, an
23 individual; FARSHID ASSEMI, an individual;
DARIUS ASSEMI, an individual; and DOES 1
24 through 100, inclusive,

25 Defendants.
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Case No. 1:24-cv-01261-KES-SAB

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

(Local Rule 144)

Action Filed: October 16, 2024
Trial Date: Not Set

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

Plaintiff METROPOLITAN LIFE INSURANCE COMPANY (“Plaintiff”), and Defendants ACDF, LLC, as successor by merger to 104 PARTNERS, LLC, WILLOW AVENUE INVESTMENTS, LLC and MARICOPA ORCHARDS, LLC (collectively “Defendants”) by and through their counsel, represent and stipulate as follows:

1. The above-captioned action was commenced on October 16, 2024. Dkt. No. 1.

2. On October 17, 2024, counsel for Plaintiff and Defendants met and conferred regarding the pending action. Counsel for Plaintiff requested that Defendants waive or acknowledge service under Federal Rule of Civil Procedure 4(d).

3. Counsel for Defendants represented that Defendants would acknowledge service and requested additional time to file a response to the Complaint, up to and including December 16, 2024. Counsel for Defendants will execute waivers of service of summons acknowledgment and Plaintiff will promptly file the waivers with the Court. Defendants will file a response to the Complaint by no later than December 16, 2024 regardless of the date of the waiver is signed.

Now therefore, Plaintiff and Defendants stipulate under Local Rule 144(a) that the deadline to file a response to the Complaint shall be December 16, 2024.

DATED: October 24, 2024

STOEL RIVES LLP

/s/ Thomas A. Woods

MICHAEL B. BROWN, Bar No. 179222
THOMAS A. WOODS, Bar No. 210050
BENJAMIN J. CODOG, Bar No. 307034
MICHELLE J. ROSALES, Bar No. 343519

Attorneys for Plaintiff
METROPOLITAN LIFE INSURANCE
COMPANY

1 DATED: October 24, 2024

MCDERMOTT WILL & EMERY LLP

2 /s/ Robert Barton (as authorized on October 23, 2024)

3 ROBERT BARTON, Bar No. 269455

4 *Attorneys for Defendants*

5 ACDF, LLC, WILLOW AVENUE
6 INVESTMENTS, LLC and MARICOPA
7 ORCHARDS, LLC
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